

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

Civil Division

2021 FEB 12 AM 9:06

Case No.

**3-21CV0314-E**

(to be filled in by the Clerk's Office)

Serafina Liccardi

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

See Attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Serafina Liccardi
Street Address	1551 Quartet Drive
City and County	Dallas
State and Zip Code	Texas 75241
Telephone Number	9088832665
E-mail Address	Sliccardi@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

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**Defendant No. 1**

Name	Frederick W. Smith
Job or Title <i>(if known)</i>	Owner - Federal Express Corporation
Street Address	942 So Shady Grove Rd.
City and County	Memphis, Shelby
State and Zip Code	Tennessee, 38120
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 2**

Name	Frank McGowen
Job or Title <i>(if known)</i>	Deputy Chief, Air Carrier Police Dept. - Federal Express Corp
Street Address	942 So Shady Grove Rd
City and County	Memphis, Shelby
State and Zip Code	Tennessee, 38120
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 3**

Name	Federal Express Corporation
Job or Title <i>(if known)</i>	
Street Address	942 So Shady Grove Rd
City and County	Memphis, Shelby
State and Zip Code	Tennessee, 38120
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 4**

Name	Northwest Research Inc.
Job or Title <i>(if known)</i>	Acquiree of Federal Express
Street Address	5420 W 2100 S
City and County	Salt Lake City
State and Zip Code	Utah, 84120
Telephone Number	
E-mail Address <i>(if known)</i>	SEE ATTACHED FOR ADDITIONAL DEFENDANTS

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)**

1. If the plaintiff is an individual

The plaintiff, (name) Serafina Liccardi, is a citizen of the  
State of (name) TEXAS.

2. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**B. The Defendant(s) SEE ATTACHED FOR Additional Defendants**

1. If the defendant is an individual

The defendant, (name) Frederick W. Smith, is a citizen of  
the State of (name) Tennessee. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation

The defendant, (name) Federal Express Corporation, is incorporated under  
the laws of the State of (name) Tennessee, and has its  
principal place of business in the State of (name) Tennessee.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**C. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Negligence Caused and Unknown but Colossal amount of Financial Damage

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On *(date)* 11/03/2020 , at *(place)* ,

the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

Federal Express Misdeldivered my unfinished Trademark and Copyright protected merchandise materials to an Amazon location near me and are now entirely missing.

See Attached

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The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)*

This Misdeldelivery caused the obliteration of my Artist and Author Debut on November 15, 2020, an unknown but colossal and incalculable amount of financial damage.

See Attached

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See Attached

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**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

2/12/2021

Signature of Plaintiff



Printed Name of Plaintiff

Serafina Liccardi

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

Serafina Liccardi - Illumination Publication, LLC

**Plaintiff - Pro Se**

**3-21CV0314-E**

**v.**

**Civil Action No.**

Frederick W. Smith - Owner/Founder - Federal Express Corporation; and Acquiree of Northwest Research, Inc.

Frank McGowen - Deputy Chief, Air Carrier Police Department - Federal Express Corporation

Jeff Bezos - Owner/Founder - Amazon.com - Amazon Prime

Grant Twilley - Owner - Lapel Pins and Coins

**Defendants**

**COMPLAINT**

**ATTACHMENTS**

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## CERTIFICATE OF INTERESTED PERSONS

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Pursuant to Fed. R. Civ. P. 7.1 and LR 3.1(c), LR 3.2 (e), LR 7.4. LR 81.1(a)(4)(D), and LR 81.2

**PLAINTIFF PRO SE:**

**Serafina Liccardi - Owner/Founder/Artist**

**CEO Illumination Publication, LLC**

1551 Quartet Drive

Dallas, TX 75241

**Paul Miller - Owner/Founder/Operations**

**COO Illumination Publication, LLC**

1551 Quartet Drive

Dallas, TX 75241

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**DEFENDANTS:**

**Frederick W. Smith - Owner/Founder**

**Federal Express Corporation**

942 S Shady Grove Rd

Memphis, TN 38120

**&**

**Acquiree of Northwest Research, Inc.**

5420 W 2100 S

Salt Lake City, UT 84120

**Frank McGowen - Deputy Chief, Air Carrier Police Dept.**

**Federal Express Corporation**

942 S Shady Grove Rd

Memphis, TN 38120

**Jeff Bezos - Owner/Founder**

**Amazon.com - Amazon Prime**

1200 12<sup>th</sup> Avenue South, Suite 1200

Seattle, WA 98144

**Grant Twilley - Owner**

**Lapel Pins and Coins**

6566 University Blvd., Ste 100

Winter Park, FL 32792

Signature

Date

Print Name Serafina Liccardi

Company Illumination Publication, LLC

Address 1551 Quartet Drive

City, State, Zip Dallas, TX 75241

E-mail Sliccardi@yahoo.com

Telephone (908) 883-2665



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## JURISDICTIONAL STATEMENT

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DIVERSITY is the Basis of Jurisdiction in this Claim, as all of the Parties involved reside in Separate States and possibly another Country.

Signature *Serafina Liccardi*

Date 2/12/2021

Print Name Serafina Liccardi

Company Illumination Publication, LLC

Address 1551 Quartet Drive

City, State, Zip Dallas, TX 75241

E-mail Sliccardi@yahoo.com

Telephone (908) 883-2665

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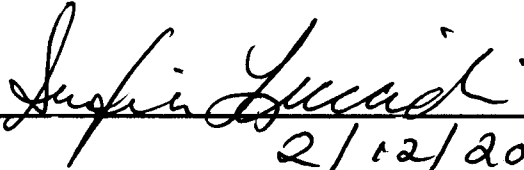
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## STATEMENT OF CLAIM

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Federal Express, Amazon Prime, and Lapel Pins and Coins, 'Handlers/Employees' **Negligently** 'Handled' and **Lost** My Private, ***Unfinished*** Limited-Edition, Trademark and Copyright Protected Merchandise, and I am now under the Threat of Trademark and Copyright Infringement from them, and other Countries, causing an unknown but Colossal amount of Financial Damage - **Is the Civil Cause of Action.**

Respectfully,

Signature   
Date 2/12/2021  
Print Name Serafina Liccardi  
Company Illumination Publication, LLC  
Address 1551 Quartet Drive  
City, State, Zip Dallas, TX 75241  
E-mail Sliccardi@yahoo.com  
Telephone (908) 883-2665

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## STATEMENT OF FACTS

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1. I, Serafina Liccardi, am a Mentally Handicapped and Physically Disabled Person, that did Business through my Company, Illumination Publication, LLC, based in Dallas, Texas, with Lapel Pins and Coins based in Florida.
2. Lapel Pins and Coins does Business with a Manufacturer based in China. (Unknown to Me)
3. The Manufacturer in China does Business with Federal Express - Corporate Office based in Memphis, TN. (No Choice to Me)
4. Federal Express and Amazon Prime Employees Negligently Handled My Trademark and Copyright Protected Merchandise. Federal Express Misdelivered My Unfinished Merchandise to an Amazon Prime location near me, and are now **Entirely Missing**. The Corporate Office for Amazon is based in Seattle, WA.
5. Federal Express did **Nothing** to find My Misdelivered/Mishandled Merchandise; and Amazon Prime did **Nothing** to find the Rightful Owner of a Package Delivered in Error.
6. This **Misdelivery/Mishandling Caused the Obliteration** of My entire PLAN for my Artist and Author's Book Debut on November 15, 2020. And now, unfinished coins that were to be engraved with MY Marks before distribution, have simply vanished.
7. I have received contradicting information from Federal Express and Lapel Pins and Coins regarding what actually happened to My missing Trademark and Copyright Protected Materials.
8. Immediately following, and ever since this Mishandling, I have been receiving an abnormally numerous amount of Cyber Hacks into a Business Account and Threats of Trademark and Copyright Infringement from other Countries regarding My Art.

9. Now I have no way of knowing:

(1) Where My Merchandise is;

(2) If My Trademark and Copyright Merchandise Material is being copied, sold or distributed here or in another Country; and

(3) If My Unfinished Trademark and Copyright Merchandise has already been Sold or Distributed here or in another Country.

10. This situation has now DESTROYED any Opportunity for Me or My Company to even BEGIN establishing Goodwill for My Mark.

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**CAUSE OF ACTION**  
**CIVIL**

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**(1) Negligence; Failure to Act;**

**Frederick W. Smith of the Federal Express Corporation and Jeff Bezos of the Amazon Prime Courier Companies** for their Handlers/Employees; **(1)** Noncompliance with their own Requirements Imposed by Breaching the “*Shipping and Handling*” part of the **Guarantee/Trust** made to the Consumer; and **(2)** Negligently Handling Private Trademark and Copyright Material, Causing Immeasurable but Colossal Financial Damage to the Trademark and Copyright Owner due to Mishandling/Misdelivery; and **(3)** Failing to Act.

by **Grant Twilley of the Lapel Pins and Coins Company** for the Negligent Handling and **Leaking** of Trademark and Copyright Art Materials to a Manufacturer in China and Causing Immeasurable but Colossal Financial Damage, and Infringement to the Trademark and Copyright Owner. **The Name of the Manufacturer in China is Unknown to Me.**

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## TABLE OF AUTHORITIES

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Morse Electro Products Corp. v. S.S. Great Peace, 437 F. Supp. 474, 482 (D.N.J. 1977) ...	1, 9
Bush v. St. Louis, K. C. & N. R. Co., 3 Mo. App. 62, 72 (Mo. Ct. App. 1876) .....	1, 9
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## SUMMARY OF FACTS

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1. On October 15, 2020, I placed an order for (200) Two Hundred Coins with (2) Two pieces of my Custom Art - {"The Warrior & The Weeper" - (1) - My Business Logo Art & (2) - My Book Cover-Art} - from Lapel Pins and Coins for Trademark and Copyright Merchandise Material.
2. On November 3, 2020, Federal Express Misdeldivered my Limited-Edition Private Trademark and Copyright Artwork - (printed on (200) Two Hundred coins - **Exhibit A**) - to an Amazon Prime Location and are now missing. Which is Negligent, (Morse Electro Products Corp. v. S.S. Great Peace) and Caused the **Obliteration** of my Artist and Author's Book Debut scheduled for November 15, 2020. **Tracking Number 1010 3053 2870**
3. Lapel Pins and Coins, Federal Express and Amazon Prime Companies are **All Negligent** in the Handling of my Trademark and Copyright Materials. (Bush v. St. Louis, K.C. & N.R. Co.)
4. On November 3, 2020 - I called to inform Federal Express that their online Tracking service is showing that my merchandise was delivered but **I Did Not** receive it. They took my information and **Never Got Back to Me**, or even checked on my merchandise until I sent a mass mailing to all Fed/Ex and Amazon locations in my area, and to the Federal Express Corporate Office in Memphis, TN. That forced me to stop all of my private production, and start searching for my Merchandise myself. No Due Diligence was shown on behalf of Federal Express or Amazon Prime Handlers/Employees to find the rightful owner of that package, which is Negligent and deems BOTH, Federal Express and Amazon, Companies Liable.

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[Morse Electro Products Corp. v. S.S. Great Peace, 437 F. Supp. 474, 482 (D.N.J. 1977)]. Misdeldelivery occurs when the party in possession of the cargo gives it to one not entitled to receive it.

[Bush v St. Louis, K. C. & N. R. Co., 3 Mo. App. 62, 72 (Mo. Ct. App. 1876)]. A Misdeldelivery of property of any bailee, to a person unauthorized to receive it, is a conversion rendering the bailee liable trover, without regard to the question of care or negligence. "Where there is a Misdeldelivery by a carrier, the question of care or negligence cannot arise; that he is absolutely liable."

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5. At this time, I contacted Dani Bucaro at Lapel Pins and Coins, and received an email stating they were, in fact, Misdelivered to Amazon, then retrieved by FedEx, then taken to another FedEx location, *Then Went Missing Entirely*. (Exhibit B)

(a) On November 3, 2020 - I contacted Dani Bucaro at Lapel Pins and Coins to notify them that the package was misdelivered.

(b) On November 4, 2020 - Dani Bucaro emailed a name of "R. Deveau" signing for that package at my address. No one by that name lives at my address and *I Am Home All Day, Every Day*.

(c) On November 9, 2020 - Dani Bucaro notified me that she was still trying to locate it.

(d) On November 11, 2020 - I received an email from Dani Bucaro that Federal Express found my package and would retrieve it and redeliver it to the correct address by the following day.

(e) On November 13, 2020 - Dani Bucaro emailed another apology for the loss stating:

*"The representative informed me that they inspect misdelivered packages to ensure none of your merchandise was damaged as well as replace the packaging itself for sanitary purposes."*

*"I had the representative I spoke to assure me that your package would be delivered by the end of the day."*

(f) On November 16, 2020 - I contacted Dani Bucaro again to inform her that I still had not received my merchandise. I received another email from Dani Bucaro stating:

*"Each time I call I have to jump through several hoops to be able to speak to the correct person. There is truthfully only so much I can do with them."*

*"I do know where your package is, and if you would like I could have the setting changed so you are able to pick it up." -*

I then notified her that I am a House-Bound Disabled person and cannot pick it up.

(g) On November 19, 2020 - I emailed Dani Bucaro that I still had not received my merchandise.

(h) On November 24, 2020 - I received an email from Dani Bucaro stating:

*"they are still investigating. We filed a Claim with them and are just waiting to hear back about how we can move forward."*

(i) On December 3, 2020, I sent an email to Dani Bucaro, and called on the phone demanding to speak to Grant Twilley regarding this Trademark and Copyright situation and never received *Any Call or Email* from him whatsoever.

6. Between this time - I filed a Missing Property Police Report (202004-2020) with Dallas South Central, Dallas, TX; and a Report to the Federal Trade Commission (125876598)

7. On December 15, 2020 - I filed a complaint with the Department of Consumer Affairs, (CGS-271036 - **Exhibit C**) then sent a *Box of My Books* [The Return of The Divine Seraphim (**Exhibit D**)] to the Corporate Office at Federal Express along with a Letter of Demand (**Exhibit E**) and the Flier (**Exhibit F**) of the missing coins and Reports I filed. (Dallas South Central Missing Property Report 202004-2020 & Federal Trade Commission Fraud Report 125876598)

**ONLY THEN** - (6) six weeks later - did I even get any attention.

8. But for the *Fact* that Federal Express Misdeldivered my merchandise, I would not have missed my Artist Debut, and the Debut Release of my First Art Book on November 15, 2020. (Bible Verse KJV- Rev.20:11-15 - About Judgement Day) An Artbook relating to the Entire Season of Jesus Christ. And the Entire Reason for me to even have these coins made for myself, was an Artistic Appreciation GIFT to MY LORD AND SAVIOR JESUS CHRIST as a token for all those that purchased my Author's Edition Book or came to a Book Signing. These coins are **Not For Sale**. And they weren't just stolen from me, they were stolen from HIM - JESUS. They were also advertised on my Facebook Page.

9. I had no time or money to redo my debut, which was entirely based on Dates that Coincide with Biblical Verses and can **Never Be Redone**. As I am a Disabled Person and live on little more than \$200.00 per week, I took what little money I had to make fliers (**Exhibit F**) and started searching the streets for my merchandise.

10. Causing the Loss of the entire Merchandising Season, Mental Distress and Anguish over the FACT that my 20-year-old Private Artwork was handled with such careless disregard, and possibly distributed among the spiteful, deceitful employees that broke into a misdelivered box of merchandise, distributed my coins among themselves and other employees, gave themselves or their families a Christmas Present of a 'Really Cool Coin', not knowing what it was for, or where it came from - due to the FACT that the coins are unfinished. I was not able to add my Mark around the edge, set up a Website or even introduce myself on Social Media Art Sales Platforms.

11. The Federal Express and Amazon Prime Courier Companies are charging premium pricing for '*Shipping and Handling*' - '*Shipping & Handling*' which means that *I Paid* for their Ships and their Hands. And because of this, *They Do Have A Fiduciary Relationship to Me*, as *I Entrusted* the Hands that Mishandled My Property. I paid money, ultimately to Frederick W. Smith, Owner and Founder of Federal Express for **HIS Guarantee of Trust** that **HIS Employees** will **Handle** My Property with Honesty and Integrity.

12. Unilaterally Eliminating the "HANDLING" part of the job that I paid for, *Breaches Trust* - Not only My Trust, but **All Consumer/Public Trust** as well - and fails to comply with their own requirements imposed. Eliminating the most expensive and time-consuming part of the job that I paid for, Increases Their Profit Margin Significantly. Skipping the part of putting the package that I entrusted his Employees with, to put into My Hands, or the hands of the *Specified Recipient*, with a Signature from the Recipient, Fails to Comply with their own well-established and well-known Business Practice and *is a very cunning Constructive Financial Fraud*.

13. On December 17, 2020 at 1:11 PM - I spoke to Frank McGowen - Deputy Chief, Air Carrier Police Department at Federal Express, to Deny the Claim being made by the unknown Manufacturer in China for My LOST Trademark and Copyright Materials. Then, just hours after, starting at 4:17 PM, I received (10) Cyber Hack alerts regarding an outdated Square Business Account with one dollar (\$1) in it. Originating from China, then to a succession of Countries that I would be forced to then Trademark and Copyright my materials causing even more financial difficulties. Now I am faced with the threat of Theft from Ten (10) other Countries for My Artwork.(**Exhibit G**) And I continue to receive these Cyber Hacks to my Private Business Account on a regular basis.

14. On December 21, 2020, - I then received an email from an Attorney in China stating to Trademark and Copyright my work there and in numerous surrounding Countries, or it will be done by someone in China first.(**Exhibit H**) Now forcing my Brand New, tiny, Handicapped Person's Private Art Publishing Company to not only go Public, but to Now Go Global. Which is an Incalculable but Colossal and Immeasurable Financial Loss and is Inconceivably Distressful.

15. On December 29, 2020, I spoke to Frank McGowen for the second time, after Christmas, He told me: *"It's probably in a bin somewhere or it got shipped back to the Manufacturer."* Denying that it was *ever* retrieved from the Amazon location, which contradicts *all* of the information from Dani Bucaro. (**Exhibit C**) I have not heard from Frank McGowen or Federal Express since.

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## DEMANDS AND REMEDIES

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**Demands from each of the following Defendants:**

Frederick W. Smith - Owner - Federal Express Corporation and Acquiree of Northwest Research, Inc.;

Jeff Bezos - Owner - Amazon Prime;

Grant Twilley - Owner - Lapel Pins and Coins

1. **Do Not Auction, Sell, Distribute or Infringe Upon, In Any Way, My Private Trademark and Copyright Merchandise That Is Not For Resale.**
2. \$250,000 - Two Hundred Fifty Thousand Dollars - Negligence for the Mishandling and ***Loss*** of Two Hundred (200) Pieces of Merchandise with two (2) Pieces of Artwork each, of Private, ***unfinished*** Limited-Edition, Trademark and Copyright Merchandise Materials.
3. \$2.5M - Two Million, Five Hundred Thousand Dollars - Improper Handling and Loss of Private Trademark and Copyright Merchandise before the Artists Debut, not available to the public and ***Not For Resale***; And Financial Loss for the Obliteration of my Entire Book Debut (11/15/2020) about my relationship with Jesus Christ, and Financial Loss of the ENTIRE Christmas and Jesus Christ Merchandising Season.
4. \$2.5M - Two Million, Five Hundred Thousand Dollars - Emotional Distress of a Mentally and Physically Disabled Person over the Loss of her Book-Cover and Business Logo Trademark and Copyright Protected Collection of Artwork.
5. And, ***All*** Can Find My Merchandise, R. Deveau, and the People or Person Responsible for Robbing Me at Christmas.

**Remedies of Company Policies from Each of the Following Defendants:**

Frederick W. Smith - Owner - Federal Express Corporation and Acquiree of Northwest Research, Inc.;

Frank McGowen - Federal Express - Deputy Chief, Airport Carrier Police Department

Jeff Bezos - Owner - Amazon Prime;

1. Restructure **All** Courier Transportation Companies Handlers/Employees to an **ACCOUNTABILITY STANDARD.**

If the Technology exists for taking a picture of the 'Package' - which is highly absurd - then the Technology exists for taking a picture of the HANDLER and Enforcing Honesty and Integrity by imposing the '**Cost of Loss**' upon Your Own Employees as a Deterrent.

*(Any handler taking personal aggression towards other people's property is simply barbaric, and quite frankly childish and spiteful behavior that is only witnessed in situations like an animal in the jungle. It is Unacceptable Adult On-The-Job Behavior. Due to the Covid-19 Pandemic, there are a lot of Unemployed, Honest, Reliable and Hard-Working people, that would be more than happy and willing to do the job required.)*

2. Security Cameras in the Trucks, Security Cameras on the Handlers, Security Cameras Everywhere. A Picture of the Handler in Possession of Package **at All Times**. Every Tracking Scan should have the picture of the **Face of the Handler** using that Scanner - Identified by an Employee Number or Fingerprint. A Picture of the Face of the Handler coming to My house to deliver that package, and picture of the person's Face that signed for said package.

3. Now that people are home from Covid-19 - Handlers/Employees must ring the bell, knock and **Get A Signature**. **No More** Abandoned/Unattended Packages and **No More** Anonymity - (so the thieves can follow behind the Truck Route to collect the **Delivered but Abandoned /Unattended** Packages.)

**Remedies from the Following Defendant:**

Grant Twilley - Owner - Lapel Pins and Coins:

Cease and Desist in the Use of, in any way, Any of My Private Trademark & Copyright Art Merchandise Materials, in This Country or In Any Other Country. Specifically China, Where Your Joint Business/Manufacturer Resides.

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## **CONCLUSION AND PRAYER FOR RELIEF**

1. In Conclusion, the Covid-19 Pandemic has caused ***Great Loss*** throughout the ***Entire Nation and around the World***. Federal Express Failed to Uphold their part in providing the necessary Service of 'Security and Protection of Private Property' to the General Consumer. They ***Could Not Guarantee*** the Transportation Times, yet Costs for their Services remained the same and/or even increased, imposing additional Import charges.
2. Companies like these are benefitting from the carnage of lives in this Nation and around the World. This should not be allowed. Capitalizing from the Devastation around the World in a time of despair, is a Shameless display of Greed and Manipulation.
3. I have provided Support of Federal Express acknowledging the Misdelivery. They ***Cannot Guarantee*** the '***Handling***' part of the '***Shipping & Handling***' that I, and You the Consumer, are paying for. They ***Cannot Guarantee*** that I, You or the Recipient will even receive their property at all.
4. This Breaches the Trust of Small Business, the Consumer and the General Public. It is a Conversion of Private Property and is taking advantage of the Consumer due to a Shortage of, or the Deception of their Handlers/Employees. It is a Profit Opportunity by liquidating all of these 'Undeliverable', 'Lost', 'Damaged' or 'Abandoned' Private Property of Small Businesses or the Consumer without permission for their own Financial Gain. This is an Unfair Business practice and has been an ongoing issue, originating DECADES before the Covid-19 Pandemic.
5. Two Prior and Separate Cases reference that a **Misdelivery** occurs when the party in possession of the cargo, gives it to one not entitled to receive it. (Morse Electro Products Corp. v. S.S. Great Peace); and that doing so, deems the bailee **Negligent**. (Bush v. St. Louis, K. C. & N. R. Co.)

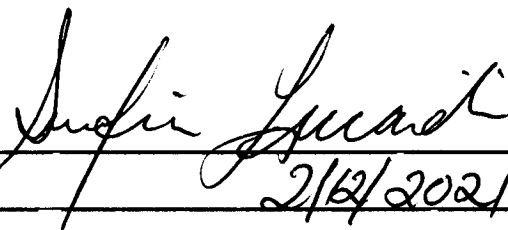


6. The Federal Trade Commission Act was thus designed to achieve two related goals: (1) fair competition between Business; and (2) the Protection of Consumers against fraudulent business practices. It allows a Business or Consumer to: (1.)(b) seek monetary redress and other relief for conduct injurious to consumers; and (2.)(c) prescribe rules defining with specificity acts or practices that are unfair or deceptive, and establishing requirements designed to prevent such acts or practices.

7. Therefore, My Claim has Great Merit, and a **Precedent Must Be Set**. All of the Defendants Failed to meet a minimal level Standard of Consumer Trust. They ***Must All*** Be Held to a Secure, Trustworthy and Accountability Standard.

8. For all of this, I beseech the Court to Accept My Claim and GRANT My Prayer for Relief.

Respectfully,

Signature   
Date 2/6/2021  
Print Name Serafina Liccardi  
Company Illumination Publication, LLC  
Address 1551 Quartet Drive  
City, State, Zip Dallas, TX 75241  
E-mail Sliccardi@yahoo.com  
Telephone (908) 883-2665

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**SIGNATURE OF COUNSEL**

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I, Serafina Liccardi, prepared and filed all paperwork associated with this Claim on behalf of  
Myself and Illumination Publication, LLC.

Respectfully,

Signature

Date

Print Name

Serafina Liccardi

Company

Illumination Publication, LLC

Address

1551 Quartet Drive

City, State, Zip

Dallas, TX 75241

E-mail

Sliccardi@yahoo.com

Telephone

(908) 883-2665



## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Serafina Liccardi

## DEFENDANTS

Frederick W. Smith - Federal Express; et. al.

(b) County of Residence of First Listed Plaintiff Dallas

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Shelby

(IN U.S. PLAINTIFF CASES ONLY)

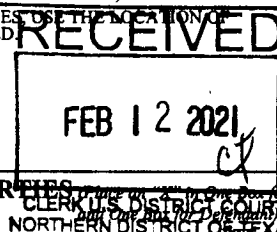
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) Attorneys (Firm Name, Address, and Telephone Number)

Plaintiff - Pro Se

Attorneys (If Known)

Unknown



## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (For Diversity Cases Only)

- Citizen of This State ☒ 1 PTF ☐ 1 DEF Incorporated or Principal Place of Business In This State ☒ 4 ☐ 4
- Citizen of Another State ☐ 2 ☒ 2 Incorporated and Principal Place of Business In Another State ☐ 5 ☒ 5
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

- |   |  |   |   |  |   |
|---|--|---|---|--|---|
| <input type="checkbox"/> 110 Insurance<br><input type="checkbox"/> 120 Marine<br><input type="checkbox"/> 130 Miller Act<br><input type="checkbox"/> 140 Negotiable Instrument<br><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment<br><input type="checkbox"/> 151 Medicare Act<br><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)<br><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits<br><input type="checkbox"/> 160 Stockholders' Suits<br><input type="checkbox"/> 190 Other Contract<br><input type="checkbox"/> 195 Contract Product Liability<br><input type="checkbox"/> 196 Franchise | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 310 Airplane<br><input type="checkbox"/> 315 Airplane Product Liability<br><input type="checkbox"/> 320 Assault, Libel & Slander<br><input type="checkbox"/> 330 Federal Employers' Liability<br><input type="checkbox"/> 340 Marine<br><input type="checkbox"/> 345 Marine Product Liability<br><input type="checkbox"/> 350 Motor Vehicle<br><input type="checkbox"/> 355 Motor Vehicle Product Liability<br><input type="checkbox"/> 360 Other Personal Injury<br><input type="checkbox"/> 362 Personal Injury - Medical Malpractice | <b>PERSONAL INJURY</b><br><input type="checkbox"/> 365 Personal Injury - Product Liability<br><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability<br><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability<br><b>PERSONAL PROPERTY</b><br><input type="checkbox"/> 370 Other Fraud<br><input type="checkbox"/> 371 Truth in Lending<br><input checked="" type="checkbox"/> 380 Other Personal Property Damage<br><input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881<br><input type="checkbox"/> 690 Other<br><input type="checkbox"/> 710 Fair Labor Standards Act<br><input type="checkbox"/> 720 Labor/Management Relations<br><input type="checkbox"/> 740 Railway Labor Act<br><input type="checkbox"/> 751 Family and Medical Leave Act<br><input type="checkbox"/> 790 Other Labor Litigation<br><input type="checkbox"/> 791 Employee Retirement Income Security Act<br><input type="checkbox"/> 462 Naturalization Application<br><input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158<br><input type="checkbox"/> 423 Withdrawal 28 USC 157<br><input type="checkbox"/> 820 Copyrights<br><input type="checkbox"/> 830 Patent<br><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application<br><input type="checkbox"/> 840 Trademark<br><input type="checkbox"/> 880 Defend Trade Secrets Act of 2016<br><input type="checkbox"/> 861 HIA (1395ff)<br><input type="checkbox"/> 862 Black Lung (923)<br><input type="checkbox"/> 863 DIWC/DIWW (405(g))<br><input type="checkbox"/> 864 SSID Title XVI<br><input type="checkbox"/> 865 RSI (405(g))<br><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)<br><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act<br><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))<br><input type="checkbox"/> 400 State Reapportionment<br><input type="checkbox"/> 410 Antitrust<br><input type="checkbox"/> 430 Banks and Banking<br><input type="checkbox"/> 450 Commerce<br><input type="checkbox"/> 460 Deportation<br><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations<br><input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)<br><input type="checkbox"/> 485 Telephone Consumer Protection Act<br><input type="checkbox"/> 490 Cable/Sat TV<br><input type="checkbox"/> 850 Securities/Commodities/Exchange<br><input type="checkbox"/> 890 Other Statutory Actions<br><input type="checkbox"/> 891 Agricultural Acts<br><input type="checkbox"/> 893 Environmental Matters<br><input type="checkbox"/> 895 Freedom of Information Act<br><input type="checkbox"/> 896 Arbitration<br><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision<br><input type="checkbox"/> 950 Constitutionality of State Statutes |
| <input type="checkbox"/> 210 Land Condemnation<br><input type="checkbox"/> 220 Foreclosure<br><input type="checkbox"/> 230 Rent Lease & Ejectment<br><input type="checkbox"/> 240 Torts to Land<br><input type="checkbox"/> 245 Tort Product Liability<br><input type="checkbox"/> 290 All Other Real Property  | <input type="checkbox"/> 440 Other Civil Rights<br><input type="checkbox"/> 441 Voting<br><input type="checkbox"/> 442 Employment<br><input type="checkbox"/> 443 Housing/Accommodations<br><input type="checkbox"/> 445 Amer. w/Disabilities - Employment<br><input type="checkbox"/> 446 Amer. w/Disabilities - Other<br><input type="checkbox"/> 448 Education  | <b>Habeas Corpus:</b><br><input type="checkbox"/> 463 Alien Detainee<br><input type="checkbox"/> 510 Motions to Vacate Sentence<br><input type="checkbox"/> 530 General<br><input type="checkbox"/> 535 Death Penalty<br><b>Other:</b><br><input type="checkbox"/> 540 Mandamus & Other<br><input type="checkbox"/> 550 Civil Rights<br><input type="checkbox"/> 555 Prison Condition<br><input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement  |   |  |   |

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

See Attached

Brief description of cause:

Negligence

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$  
See Attached

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

## FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_